

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------------|---|-----------------------|
| _____ |) | |
| INSITUFORM TECHNOLOGIES, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | CASE NO. 04-10487 GAO |
| |) | |
| AMERICAN HOME ASSURANCE |) | |
| COMPANY, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

**AGREED MOTION TO ENTER CONFIDENTIALITY STIPULATION AND
PROTECTIVE ORDER**

Plaintiff Insituform Technologies, Inc. (“Insituform”) and Defendant American Home Assurance Company (“American Home”) (collectively “the parties”) hereby move the Court to enter the enclosed Confidentiality Stipulation and Protective Order (the “Stipulation”) to allow for the production and use of certain Confidential Information (as defined in the Stipulation) in connection with this matter. In support of this motion, the parties state as follows:

1. Certain documents and information in the possession of each party is Confidential Information and the public disclosure of such information would have a deleterious effect on Insituform’s and American Home’s current business interests.
2. Counsel have conferred and the parties have agreed upon the enclosed Stipulation, which has been executed on behalf of Insituform and American Home.

WHEREFORE, the parties respectfully request that the enclosed Stipulation be entered.

Respectfully submitted,

INSITUFORM TECHNOLOGIES, INC.,

By its attorneys,

/s/ Charles L. Philbrick (by permission)

Stanley A. Martin
Holland & Knight LLP
10 St. James Avenue
Boston, MA 02116
(617) 523-2700

Charles L. Philbrick
Holland & Knight LLP
131 S. Dearborn Street, 30th Floor
Chicago, IL 60603-5547
(312) 263-3600

Dated: July 26, 2006

Respectfully submitted,

AMERICAN HOME ASSURANCE COMPANY,

By its attorneys,

/s/ Kurt M. Mullen

Gregory P. Deschenes (BBO # 550830)
Gregg A. Rubenstein (BBO # 639680)
Kurt M. Mullen (BBO # 651954)
Nixon Peabody LLP
100 Summer Street
Boston, MA 02110-2131
(617) 345-1000

Dated: July 26, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 26, 2006.

/s/ Kurt M. Mullen